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FILED  
Clerk  
District Court

DEC 30 2022

for the Northern Mariana Islands  
by \_\_\_\_\_  
(Deputy Clerk)

*Attorneys for the United States of America*

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN MARIANA ISLANDS

UNITED STATES OF AMERICA,

Plaintiff,

vs.

\$271,087.88 IN U.S. CURRENCY SEIZED  
FROM BANK OF SAIPAN ACCOUNT NO.  
ENDING IN LAST FOUR DIGITS 0157,  
HELD IN THE NAME OF "MCS"; and

\$39,188.38 IN U.S. CURRENCY SEIZED  
FROM BANK OF SAIPAN ACCOUNT NO.  
ENDING IN LAST FOUR DIGITS 2098,  
HELD IN THE NAME OF "MCS",

Defendants.

CIVIL CASE NO. **CV 22-00020**

**APPLICATION FOR WARRANT OF  
ARREST *IN REM***

The United States of America, by and through undersigned counsel, respectfully requests that the Clerk of this Court issue the attached Warrant of Arrest *in Rem* pursuant to Rule G(3)(b)(i) of the Federal Rules of Civil Procedure, Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions (attached as Government Exhibit 1). In support of its application, the United States avers as follows:

1. On December 30, 2022, the United States filed a Verified Complaint for Forfeiture *in Rem* ("Verified Complaint") in the above-entitled case. The Verified Complaint seeks the

1 forfeiture of the below listed properties:

2 a. \$271,087.88 in U.S. currency, which was seized on November 8, 2019,  
3 from Bank of Saipan Account No. ending in last four digits 0157, held  
in the name of "MCS"; and

4 b. \$39,188.38 in U.S. currency, which was seized on November 8, 2019,  
5 from Bank of Saipan Account No. ending in last four digits 2098, held  
in the name of "MCS".

6 (hereafter collectively referred to as "defendant properties").

7 The defendant properties are in the control of the Internal Revenue Service-Criminal  
8 Investigation, which obtained such possession, custody and control on the dates stated in the above  
9 descriptions of defendant properties, pursuant to a seizure warrant related to the on-going criminal  
10 investigation.

11 2. Supplemental Rule G(3)(b)(i) provides that if a property is subject to forfeiture in  
12 a civil forfeiture case, and the property is in the Government's possession, custody or control, the  
13 clerk "must issue a warrant to arrest the property."

14 **WHEREFORE**, the United States respectfully requests that the Clerk of the Court issue  
15 the attached Warrant of Arrest *in Rem*.

16 RESPECTFULLY SUBMITTED this 30th day of December, 2022.

17 SHAWN N. ANDERSON  
18 United States Attorney  
Districts of Guam and the NMI

19 By: /s/ Jessica F. Wessling  
20 JESSICA F. WESSLING  
21 ERIC S. O'MALLEY  
22 Assistant U.S. Attorneys  
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